

**DEPARTMENT OF CONSUMER AFFAIRS
BOARD OF PSYCHOLOGY
INITIAL STATEMENT OF REASONS**

Hearing Date: May 6, 2006

Subject Matter of Proposed Regulations: Waiver of Examination Under Section 2946

Sections Affected: 1388.6, 1381.5

Specific Purpose of each adoption, amendment, or repeal:

This proposed amendment would:

- Add a new subsection (e) which would waive the Examination for Professional Practice in Psychology (EPPP) for an applicant who is currently certified by the American Board of Professional Psychology (ABPP) and licensed at the doctoral level in another state, Canadian province, or U.S. territory for a minimum of five years.
- The current subsection (e) would be re-lettered to (f) and subsection (f) would be re-lettered to (g). Also, in the new subsection (g) as of January 1, 2006, the name of the written examination known as the California Jurisprudence and Professional Ethics Examination (CJPEE) has been changed to the California Psychology Supplemental Examination (CPSE).
- Currently, section 1381.5 makes reference to section 1388.6(e). This proposal would reflect the proposed changes in 1388.6 by updating the subsection (e) to (f).

Factual Basis/Rationale

Section 2946 of the Business and Professions Code provides that the board, at its discretion, may waive the examinations when in the judgement of the board the applicant has already demonstrated competence in areas covered by the examinations. Specifically, section 2946 provides in relevant part that the board may waive the examinations for a psychologist who is certified by the ABPP.

Currently, section 1388.6 of the California Code of Regulations waives the national written Examination for Professional Practice in Psychology (EPPP) in the following circumstances:

- When a California-licensed psychologist has been licensed for at least five years and has allowed his/her license to expire by not renewing the license for at least three years.
- If an applicant for licensure as a psychologist has been licensed in another state, Canadian province, or U.S. territory for at least five years.
- If an applicant for licensure as a psychologist holds a Certificate of Professional Qualification (CPQ) issued by the Association of State and Provincial Psychology Boards (ASPPB). Such an applicant shall be deemed to have met the educational

and experience requirements of subdivisions (b) and (c) of Code section 2914.

- If an applicant for licensure as a psychologist who has abandoned his/her application pursuant to section 1381.5 of the California Code of Regulations and must reapply for a license.
- If an applicant for licensure as a psychologist is credentialed as a Health Service Provider by the National Register of Health Service Providers in Psychology (NRHSPP). Such an applicant shall be deemed to have met the educational and experience requirements of subdivisions (b) and (c) of Code section 2914.

In order to be licensed, the applicant is required to file a complete application and meet all current licensing requirements not addressed above including payment of any fees, take and pass the California Psychology Supplemental Examination (CPSE) and not been subject to discipline.

This proposal would waive the EPPP for an applicant currently certified by the American Board of Professional Psychology (ABPP) and has been licensed based on a doctoral degree in another state, Canadian province, or U.S. territory for a minimum of five years. Such an applicant shall be deemed to have met the educational and experience requirements of subdivisions (b) and (c) of Code section 2914. Like others for whom the EPPP is waived, such applicants would also be required to file a complete application and meet all current licensing requirements not addressed above, including payment of any fees, take and pass the CPSE, and not been subject to discipline.

This proposal would also amend section 1381.5 to reflect the proposed changes in 1388.6 subsection (e) which was re-lettered to subsection (f).

Underlying Data

Letter (including certification documents) from Norma Simon, Ed.D., ABPP (Attachment A)
Brochure from ABPP which includes certification criteria to become a certified specialist (Attachment B)

Business Impact

This regulation will not have a significant adverse economic impact on businesses since it does not require applicants to become certified as a board certified specialist with the ABPP. Rather the proposed amendment merely offers applicants for licensure as a psychologist in California another option to streamline the licensing process.

Specific Technologies or Equipment

This regulation does not mandate the use of specific technologies or equipment.

Consideration of Alternatives

No reasonable alternative to the regulation would be either more effective in carrying out the purpose for which the action is proposed or would be as effective and less burdensome to affected private persons than the proposed regulation.